

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

C.A. No.: 04-11842-PBS

SCOTT RODGERS,	)
Plaintiff	)
v.	)
	)
CORRECTION OFFICER ORCHID,	)
UNKNOWN CORRECTION OFFICER JOHN	)
DOE, JOE WHITMORE, DR. HOWARD,	)
JOHN SMITH, PLYMOUTH COUNTY	)
Defendant	)

**COUNSEL CERTIFICATION PURSUANT TO LOCAL RULE 16.1(D)(3)**

In accordance with Local Rule 16.1(D)(3), the undersigned counsel as an authorized representative of Defendants, certifies that counsel and parties have conferred with a view to establishing a budget for the cost of conducting the full course and various alternate courses of litigation and to consider the resolution of the litigation through the use of ADR process such as those outlined in Local Rule 16.1(D)(3).

Respectfully submitted,  
Defendants  
By their Attorney:

/s/ Patrick C. Lee

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Patrick Lee, General Counsel  
Plymouth County Sheriff's Department  
24 Long Pond Road  
Plymouth, MA 02360  
(508) 830-6287  
B.B.O. #634980

**CERTIFICATE OF SERVICE**

I, Patrick Lee, hereby certify that on this 4<sup>th</sup> day of May 2005, I served one true and correct copy of the Defendants' Counsel Certification Pursuant to Local Rule 16.1(D)(3), on plaintiff's attorney by first class US mail to, Jessica Hedges, Hrones, Garrity and Hedges LLP, Lewis Warf-Bay 232, Boston MA.

/s/ Patrick C. Lee

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Patrick Lee